

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

.....X  
AMERICAN CIVIL LIBERTIES UNION and  
THE AMERICAN CIVIL LIBERTIES UNION  
FOUNDATION,

Plaintiffs,

v.

15 Civ. 1954 (CM)

DEPARTMENT OF JUSTICE, including its  
components the Office of Legal Counsel and  
Office of Information Policy, DEPARTMENT  
OF DEFENSE, DEPARTMENT OF STATE, and  
CENTRAL INTELLIGENCE AGENCY,

Defendants.

.....X

**NOTICE OF MOTION**

PLEASE TAKE NOTICE THAT, upon the Declarations of John E. Bies, Douglas R. Hibbard, Mark H. Herrington, and John F. Hackett, the exhibits annexed thereto, and the accompanying memorandum of law, defendants the Department of Justice, including its components the Office of Legal Counsel and Office of Information Policy, the Department of Defense, the Central Intelligence Agency and the Department of State, by their attorneys, Preet Bharara, United States Attorney for the Southern District of New York, and Benjamin C. Mizer, Principal Deputy Assistant Attorney General, will move this Court before the Honorable Colleen McMahon, United States District Judge, at the United States Courthouse, 500 Pearl Street, New York, New York 10007, for an order partially modifying the scheduling order issued in this action on April 30, 2015.

Dated: New York, New York  
July 1, 2015

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Principal Deputy Attorney General

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Southern District of New York

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